

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

*Proposed Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11

(Lead Case)
(Jointly Administered)

**NOTICE OF AGENDA FOR
MARCH 27, 2019 9:30 A.M.
OMNIBUS HEARING**

Date: March 27, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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**PROPOSED AGENDA FOR
MARCH 27, 2019 9:30 A.M. (PACIFIC TIME)
OMNIBUS HEARING**

I. MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)

UNCONTESTED MATTERS GOING FORWARD

1. **Supplemental Prepetition Taxes Motion:** Supplemental Motion Pursuant to 11 U.S.C. §§ 105, 363(b), 507(a), and 541(d) and Fed. R. Bankr. P. 6004 Authorizing Debtors to Pay Prepetition Taxes and Assessments and Granting Related Relief [**Dkt. 761**].

Response Deadline: March 20, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed: No responses were filed.

Related Documents:

- A. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 363, 507(a), and 541(d) and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to Pay Certain Prepetition Taxes and Assessments and Granting Related Relief [**Dkt. 11**].
- B. Declaration of Jason B. Wells in Support of First Day Motions and Related Relief [**Dkt. 28**]
- C. Declaration of Mark Caron in Support of Supplemental Motion Pursuant to 11 U.S.C. §§ 105, 363(b), 507(a), and 541(d) and Fed. R. Bankr. P. 6004 Authorizing Debtors to Pay Prepetition Taxes and Assessments and Granting Related Relief [**Dkt. 762**].
- D. Request for Entry of Order by Default on Supplemental Motion Pursuant to 11 U.S.C. §§ 105, 363(b), 507(a), and 541(d) and Fed. R. Bankr. P. 6004 Authorizing Debtors to Pay Prepetition Taxes and Assessments and Granting Related Relief [**Dkt. 1037**]

Status: No objections or responses were received to the Supplemental Prepetition Taxes Motion. The Debtors filed a request for entry of order by default and uploaded the proposed order on the Supplemental Prepetition Taxes Motion. If the Court does not enter the proposed order on the Supplemental Prepetition Taxes Motion before the hearing, this matter will go forward on an uncontested basis.

CONTESTED MATTERS GOING FORWARD

2. **Butte County Prepetition Settlement Agreement Motion:** Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) for Authority to Continue Performance under Prepetition Settlement Agreement with Butte County District Attorney's Office to Fund Enhanced Fire Prevention and Communications Program [**Dkt. 770**].

Response Deadline: March 20, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Limited Opposition to Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) for Authority to Continue Performance under Prepetition Settlement Agreement with Butte County District Attorney's Office to Fund Enhanced Fire Prevention and Communications Program [**Dkt. 986**].

Related Documents:

- B. Declaration of Stephen L. Schirle in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) for Authority to Continue Performance under Prepetition Settlement Agreement with Butte County District Attorney's Office to Fund Enhanced Fire Prevention and Communications Program [**Dkt. 769**].
- C. Reply in Support of Motion of Debtors for Authority to Continue Performance under Prepetition Settlement Agreement with Butte County District Attorney's Office to Fund Enhanced Fire Prevention and Communications Program [**Dkt. 1028**].
- D. Statement of the Official Committee of Tort Claimants in Response to (I) Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) for Authority to Continue Performance under Prepetition Settlement Agreement with Butte County District Attorney's Office to Fund Enhanced Fire Prevention and Communications Program, and (II) Limited Objection of the Singleton Law Firm Fire Victim Claimants [**Dkt. 1029**].

Status: This matter is going forward.

3. **NOL Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 362 for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, the Debtors [**Dkt. 10**].

Response Deadline: February 20, 2019.

Responses Filed:

- A. Limited Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 362 for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, the Debtors [**Dkt. 605**].
- B. Corrected Limited Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 362 for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, the Debtors [**Dkt. 613**].
- C. Joinder of BOKF, NA as Indenture Trustee to Limited Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant

to 11 U.S.C. §§ 105(a) and 362 for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, the Debtors [Dkt. 614].

- D. Joinder of the Ad Hoc Committee of Senior Unsecured Noteholders to Limited Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 362 for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims Against, the Debtors [Dkt. 616].

Related Documents:

- E. Interim Order Pursuant to 11 U.S.C. §§ 105(a) and 362 Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims against, the Debtors [Dkt. 212].
- F. Proposed Final Order on the NOL Motion and redline comparison against the interim order previously entered by the Court [Dkt. 491-9].
- G. Reply of Debtors to Limited Objection of Unsecured Creditors Committee and Successor Indenture Trustee to Motion for Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Stock of, and Claims against, the Debtors [Dkt. 650].
- H. Further Revised Proposed Final Order on the NOL Motion and redline comparison against the proposed final order previously filed with the NOL Motion [Dkt. 654-6].

Status: This matter is going forward.

4. **DIP Financing Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing, and (V) Granting Related Relief [Dkt. 23].

Response Deadline: February 20, 2019, except for the Official Committee of Unsecured Creditors and the Official Committee of Tort Claimants, for whom the response deadline was extended by stipulation and order to March 8, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. Sonoma Clean Power Authority's Statement of Support for Debtors' Motion for Postpetition Financing and Reservation of Rights [Dkt. 65].
- i. Declaration of Geoffrey G. Syphers in Support of Sonoma Clean Power Authority's Statement [Dkt. 67].

- 1 B. Statement of Peninsula Clean Energy Authority (A) In Support of
2 Debtors' Motion for Postpetition Financing and (B) Reservation of Rights
3 [Dkt. 149].
- 4 C. Preliminary Objection of California State Agencies to DIP Financing
5 Motion [Dkt. 162].
- 6 D. Objection of the United States Trustee to Debtors' Motion for Interim and
7 Final Orders Authorizing Debtor in Possession Financing [Dkt. 168].
- 8 E. Statement and Reservation of Rights of the California Self-Insurers'
9 Security Fund Regarding the DIP Motion and Entry of the Proposed
10 Interim DIP Order [Dkt. 172].
- 11 F. Objection of the Public Entities to Motion of Debtors Pursuant to 11
12 U.S.C. §§ 105, 362, 363, 364, 503 and 507, and Fed.R. Bankr. P. 2002,
13 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing
14 the Debtors to Obtain Senior Secured, Superpriority, Postpetition
15 Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying
16 the Automatic Stay, (IV) Scheduling Final Hearing and (V) Granting
17 Related Relief [Dkt. 494].
- 18 G. Joinder by the SLF Fire Victim Claimants in Objection of the Public
19 Entities to Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 362, 363, 364,
20 503 and 507, and Fed.R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for
21 Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior
22 Secured, Superpriority, Postpetition Financing, (II) Granting Liens and
23 Superpriority Claims, (III) Modifying the Automatic Stay, (IV)
24 Scheduling Final Hearing and (V) Granting Related Relief [Dkt. 519].
- 25 H. Statement and Reservation of Rights of the California Self-Insurers'
26 Security Fund Regarding the DIP Motion and Entry of the Proposed Final
27 DIP Order [Dkt. 576].
- 28 I. Statement and Reservation of Rights of Official Committee of Unsecured
Creditors with respect to Certain Matters Scheduled for February 27
Hearing [Dkt. 610].
- J. Objection of the Official Committee of Tort Claimants to Debtors' DIP
Financing Motion [Dkt. 800].
- K. Objection of the SLF Fire Victim Claimants to Motion of Debtors
Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503, and 507, and Fed. R.
Bankr. P. 2002, 4001, 6003, 6004, and 9014 for Interim and Final Orders
(I) Authorizing the Debtors to Obtain Senior Secured, Superpriority,
Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III)
Modifying the Automatic Stay, (IV) Scheduling Final Hearing, and (V)
Granting Related Relief [Dkt. 804].
- i. Declaration of Gerald Singleton in Support of Objection [Dkt.
804-1].
- ii. Request for Judicial Notice in Support of Objection [Dkt. 804-2].

L. Joinder of Individual Butte Fire, North Bay Fires, and Camp Fire Victim Claimants in the Objection by the Official Committee of Tort Claimants to Debtors' DIP Financing Motion [**Dkt. 828**].

i. Declaration of Dario Ghetaldi, Esq., in Support of Joinder of the Official Committee of Tort Claimants to Debtors' DIP Financing Motion [**Dkt. 828-1**].

M. Statement of the Official Committee of Unsecured Creditors in Support of the Final Approval of the Debtors' DIP Motion [**Dkt. 835**].

Related Documents:

N. Interim Order Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing, and (V) Granting Related Relief [**Dkt. 217**].

O. Declaration of David Kurtz in Support of Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling Final Hearing, and (V) Granting Related Relief [**Dkt No. 24**].

P. Notice of Filing of Proposed Final Order Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503, and 507 and Fed. R. Bankr. P. 2002, 4001, 6004, and 9014 (I) Authorizing Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [**Dkt. 709**].

Q. Debtors' Omnibus Reply in Support of Debtors' DIP Financing Motion and in Response to the Objections Thereto [**Dkt. 817**].

R. Omnibus Reply of the DIP Administrative Agent to the Objections of (I) the Official Committee of Tort Claimants, (II) the Public Entities, and (III) the SLF Fire Victim Claimants to Debtors' Motion Seeking Postpetition Financing [**Dkt. 818**].

S. Notice of Filing of Revised Proposed Final Order Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503, and 507 and Fed. R. Bankr. P. 2002, 4001, 6004, and 9014 (I) Authorizing Debtors to Obtain Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and Superpriority Claims, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [**Dkt. 1035**].

Status: This matter is going forward.

CONTINUED MATTERS:

5. **Hedging Programs Motion:** Motion Pursuant to 11 U.S.C. §§ 105, 363, and 364 and Fed. R. Bankr. P. 4001 and 6004 Authorizing Utility to (A) Continue Hedging Programs, (b) Enter Into and Perform Under Postpetition Hedging Transactions, and (C) Pledge Collateral and Honor Obligations Thereunder [**Dkt. 780**].

Response Deadline: March 20, 2019, at 4:00 p.m. (Pacific Time) except for the following parties, for whom the response deadline was extended to April 2, 2019, at 4:00 p.m. (Pacific Time), as set forth in the Notice of Continued Hearing [**Dkt. 978**]:

1. Official Committee of Tort Claimants
2. Official Committee of Unsecured Creditors

Responses Filed:

A. Turner Construction Company's Limited Objection to Pacific Gas and Electric Company's Motion Pursuant to 11 U.S.C. §§ 105, 363, and 364 and Fed. R. Bankr. P. 4001 and 6004 Authorizing Utility to (A) Continue Hedging Programs, (b) Enter Into and Perform Under Postpetition Hedging Transactions, and (C) Pledge Collateral and Honor Obligations Thereunder [**Dkt. 992**].

Related Documents:

B. Declaration of Fong Wan in Support of Motion to 11 U.S.C. §§ 105, 363, and 364 and Fed. R. Bankr. P. 4001 and 6004 Authorizing Utility to (A) Continue Hedging Programs, (b) Enter into and Perform under Postpetition hedging Transactions, and (C) Pledge Collateral and Honor Obligations Thereunder [**Dkt. 781**].

Status: This matter has been continued to the omnibus hearing to be held on April 9, 2019, at 9:30 a.m. (Pacific Time).

6. **Short-Term Incentive Plan Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [**Dkt. 782**], as corrected by Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [**Dkt. 806**].

Response Deadline: March 20, 2019, at 4:00 p.m. (Pacific Time), except for the following parties, for whom the response deadline was extended by stipulation and order to March 28, 2019, at 4:00 p.m. (Pacific Time):

1. Official Committee of Tort Claimants
2. Official Committee of Unsecured Creditors
3. *Ad Hoc* Committee of Senior Unsecured Noteholders
4. Engineers and Scientists of California, International Federation of Professional and Technical Engineers Local 20
5. Office of the United States Trustee
6. SLF Wildfire Claimants

Responses Filed:

- A. Initial Objection of the Official Committee of Tort Claimants to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [**Dkt. 847**].
- B. Joinder of the City and County of San Francisco to Initial Objection of the Official Committee of Tort Claimants to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [**Dkt. 968**].

Related Documents:

- C. Declaration of Douglas J. Friske in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [**Dkt. 783**].
- D. Declaration of Dinyar Mistry in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [**Dkt. 784**].
- E. *Ex Parte* Application for Order Extending Time for Hearing on Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief (ECF No. 782) [**Dkt. 931**].
- F. Debtors' Notice of Acceptance of the Court's Tentative Ruling on the Official Committee of Tort Claimants' *Ex Parte* Application for Order Extending Time for Hearing on Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief (ECF No. 782) [**Dkt. 939**].

Status: This matter has been continued to the omnibus hearing to be held on April 9, 2019, at 9:30 a.m. (Pacific Time).

7. **Employee Wages and Benefits Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay Prepetition Wages, Salaries, Withholding Obligations, and Other Compensation and Benefits; (II) Maintain Employee Benefits Programs; and (III) Pay Related Administrative Obligations [**Dkt. 8**].

Response Deadline: March 20, 2019 at 4:00 p.m. (Pacific Time).

Responses Filed:

- A. ESC Local 20's Response to Debtors' Motion to Pay Prepetition Employee Obligations and Continue Wages and Benefits [**Dkt. 501**].
 - i. Declaration of Joshua Sperry in support of ESC Local 20's Response [**Dkt. 503**].

- 1 B. Opposition of Certain Fire Damage Plaintiffs/Claimants Relating to the
2 North Bay Fire Litigation of October 2017 and the Camp Fire Litigation to
3 Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and
4 Fed. R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay
5 Prepetition Wages, Salaries, Withholding Obligations, and Other
6 Compensation and Benefits; (II) Maintain Employee Benefits Programs;
7 and (III) Pay Related Administrative Obligations [**Dkt. 517**].
- 8 C. Statement and Reservation of Rights of Official Committee of Unsecured
9 Creditors with respect to Certain Matters Scheduled for February 27
10 Hearing [**Dkt. 610**].
- 11 D. ESC Local 20's Sur-Reply to Debtors' Motion to Pay Prepetition
12 Employee Obligations and Continue Wages and Benefits [**Dkt. 646**].

13 Related Documents:

- 14 E. Interim Order Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed.
15 R. Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay
16 Prepetition Wages, Salaries, Withholding Obligations, and Other
17 Compensation and Benefits; (II) Maintain Employee Benefits Programs;
18 and (III) Pay Related Administrative Obligations [**Dkt. 210**].
- 19 F. Proposed Final Order on the Employee Wages and Benefits Motion and
20 redline comparison against the interim order previously entered by the
21 Court [**Dkt. 491-8**].
- 22 G. Debtors' Statement and Omnibus Reply in Support of First Day and Other
23 Motions set for Hearing on February 27, 2019 [**Dkt. 652**].
- 24 H. Further revised Proposed Final Order on the Employee Wages and
25 Benefits Motion and redline comparison against the interim order
26 previously entered by the Court [**Dkt. 654-5**].
- 27 I. Final Order Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R.
28 Bankr. P. 6003 and 6004 for Interim and Final Authority to (I) Pay
Prepetition Wages, Salaries, Withholding Obligations, and Other
Compensation and Benefits; (II) Maintain Employee Benefits Programs;
and (III) Pay Related Administrative Obligations [**Dkt. 705**].

Status: Pursuant to Paragraph 11 of the Final Employee Wage and Benefits
Order, ESC Local 20's objection, as it relates to STIP Awards (as defined in the
Employee Wage and Benefits Motion) solely for members of ESC Local 20, was
preserved. The objection of the ESC Local 20 labor union is preserved and
continued pending the outcome of the Short-Term Incentive Plan Motion [**Dkt.
782**].

1 **II. MATTERS SCHEDULED TO BE HEARD IN ADVERSARY PROCEEDING:**
2 **PG&E Corp. v. Public Employees Ret. Assoc. of New Mexico, et al., Adv. Pro. No. 19-**
3 **03006 (DM)**

- 4 **A. Motion for Preliminary Injunction.** Motion for Preliminary Injunction and
5 Memorandum of Points and Authorities in Support of Debtors' Motion for
6 Preliminary Injunction as to Actions Against Non-Debtors [**AP Dkt. 2**].

7 Response Deadline: March 13, 2019.

8 Responses Filed:

- 9 **A. Guzman Response.** Memorandum of Points and Authorities in Support
10 of Creditor Enrique Guzman's Opposition to Motion for Preliminary
11 Injunction as to Actions Against Non-Debtors [**AP Dkt. 13**].

- 12 i. Declaration of Jonathan E. David in Support of Creditor Enrique
13 Guzman's Opposition to Motion for Preliminary Injunction as to
14 Actions Against Non-Debtors [**AP Dkt. 12**].

- 15 **B. Tiger Gas Response.** Opposition to Debtor's Complaint for Preliminary
16 and Permanent Injunctive Relief to Stay Actions Against Non-Debtors.
17 [**Main Case 19-30088 Dkt. 859**].

- 18 i. Declaration of Leah E. Capritta [**Main Case 19-30088 Dkt. 860**].

- 19 **C. Tiger Gas Amended Response.** Amended Opposition to Debtors'
20 Motion for Preliminary Injunctive Relief as to Actions Against Non-
21 Debtors (Doc. 2) [**AP Dkt. 14**].

- 22 i. Declaration of Leah E. Capritta [**AP Dkt. 15**].

- 23 **D. Remington Response.** Remington's Declaration in Opposition to
24 Debtor's Complaint for Preliminary and Permanent Injunctive Relief to
25 Stay Actions Against Non-Debtors. [**AP Dkt. 17**].

26 Related Documents:

- 27 **E. Debtors' Complaint for Preliminary and Permanent Injunctive Relief as to**
28 **Actions Against Non-Debtors [**AP Dkt. 1**].**

- 29 **F. Declaration of Elizabeth Collier in Support of Debtors' Motion for**
30 **Preliminary Injunction as to Actions Against Non-Debtors [**AP Dkt. 3**].**

- 31 **G. Reply Memorandum of Points and Authorities in Further Support of**
32 **Debtor's Motion for Preliminary Injunction as to Actions Against Non-**
33 **Debtors [**AP Dkt. 18**].**

- 1 H. Declaration of Kevin W. Kramer in Support of Debtor's Reply
2 Memorandum of Points and Authorities in Further Support of Debtor's
3 Motion for Preliminary Injunction as to Actions Against Non-Debtors [**AP**
4 **Dkt. 19**].
- 5 I. Certificate of Service of Ira Nikelsberg Regarding Initial Adversary
6 Proceeding Documents [**AP Dkt. 7**].
- 7 J. Supplemental Certificate of Service of Ira Nikelsberg Regarding Initial
8 Adversary Proceeding Documents [**AP Dkt. 21**].
- 9 K. **Guzman Answer**. Defendant Enrique Guzman's Answer to Debtors'
10 Complaint for Preliminary and Permanent Injunctive Relief as to Actions
11 Against Non-Debtors [**Main Case 19-30088 Dkt. 1000**].
- 12 L. **Tiger Gas Answer**. Answer to Debtors' Complaint for Preliminary and
13 Permanent Injunctive Relief as to Actions Against Non-Debtors [**AP Dkt.**
14 **20**].
- 15 M. Stipulation Between Debtors and State Farm Regarding Adversary
16 Proceeding 19-03006 [**AP Dkt. 8**].
- 17 N. Stipulation and Agreement to Dismiss Christensen Defendants Without
18 Prejudice [**AP Dkt. 9**].
- 19 O. Stipulation and Agreement to Martin Farrell-Araque Without Prejudice
20 [**AP Dkt. 10**].
- 21 P. Order Granting Stipulation Between Debtors and State Farm Regarding
22 Adversary Proceeding 19-03006 [**AP Dkt. 11**].

23 Status: This matter is going forward.

24
25 **PLEASE TAKE NOTICE** that copies of any papers filed with the court and referenced
26 herein can be viewed and/or obtained: (i) by accessing the Court's website at
27 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450
28 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims
agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-
4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-
mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents
on the Bankruptcy Court's website.

1 Dated: March 26, 2019

WEIL, GOTSHAL & MANGES LLP

KELLER & BENVENUTTI LLP

By: /s/ Jane Kim

Jane Kim

*Proposed Attorneys for Debtors and
Debtors in Possession*